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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation;

Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF DEFENDANT'S SUPPORT
FOR ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER PARTY'S
MATERIAL SHOULD BE SEALED**

I, Michelle Woodhouse, hereby declare:

1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Defendant’s Support for Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Motion”). The Motion seeks to have the following document entirely sealed:

Document	Sealing Request
Exhibit A to Declaration of Holden Benon in Support of Plaintiffs’ Reply to Defendant Meta Platforms, Inc.’s Opposition to Motion to Amend Case Management Schedule (“Benon Declaration”)	<ul style="list-style-type: none"> Entire document

3. Exhibit A to the Benon Declaration comprises excerpts of internal Meta documents relating to AI development. These excerpts include highly sensitive information regarding the technical development and components of Meta’s AI models and include internal discussion of this information. Public disclosure of the information in these documents exposes Meta to the risk of competitive harm.

4. Public disclosure of the information contained in the above-referenced exhibit exposes Meta to the risk of competitive and financial harm by revealing Meta’s non-public trade secret information and technical data pertaining to its generative AI offerings. For this reason, Meta takes steps to carefully protect the confidentiality of this sort of information

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct

3 Executed in Washington, DC on this 11th day of October, 2024.

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6 Michelle Woodhouse

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